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Hearing Date: July 22, 2010  
Objection Due: June 7, 2010  
Reply Due : July 2, 2010

Attorneys for Ahaus Tool & Engineering Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	: Chapter 11
DELPHI CORPORATION, <u>et al.</u> ,	: Case No. 05-44481 (RDD)
	: Jointly Administered
Debtors,	:
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	:
DELPHI CORPORATION, et al.,	: Adv. Pro. No. 07-02076 (RDD)
	:
Plaintiffs,	:
	:
- against -	:
	:
	:
AHAUS TOOL & ENGINEERING INC.	:
	:
Defendant.	:
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**JOINDER OF AHAUS TOOL & ENGINEERING INC. TO MOTIONS SEEKING AN  
ORDER (I) PURSUANT TO FED. R. CIV. P. 60 AND FED. R. BANKR. P. 9024,  
VACATING PRIOR ORDERS ESTABLISHING PROCEDURES FOR CERTAIN  
ADVERSARY PROCEEDINGS, INCLUDING THOSE COMMENCED BY THE  
DEBTORS UNDER 11 U.S.C. §§ 541, 544, 545, 547, 548, OR 549, AND EXTENDING THE  
TIME TO SERVE PROCESS FOR SUCH ADVERSARY PROCEEDINGS, (II)  
PURSUANT TO FED. R. CIV. P. 12(b) AND FED. R. BANKR. P. 7012(b), DISMISSING  
THE ADVERSARY PROCEEDING WITH PREJUDICE, OR (III) IN THE  
ALTERNATIVE, DISMISSING THE ADVERSARY PROCEEDING  
ON THE GROUND OF JUDICIAL ESTOPPEL**

AHAUS TOOL & ENGINEERING INC., (“Ahaus”) by its undersigned counsel, hereby  
joins in and adopts the arguments set forth in the following motions (the “Motions”) filed by

Wagner-Smith Company and Microchip Technology Incorporated ( the “Moving Preference Defendants”):

- 1. MOTION BY WAGNER-SMITH COMPANY SEEKING AN ORDER (I) PURSUANT TO FED. R. CIV. P. 60 AND FED. R. BANKR. P. 9024, VACATING PRIOR ORDERS ESTABLISHING PROCEDURES FOR CERTAIN ADVERSARY PROCEEDINGS, INCLUDING THOSE COMMENCED BY THE DEBTORS UNDER 11 U.S.C. §§ 541, 544, 545, 547, 548, OR 549, AND EXTENDING THE TIME TO SERVE PROCESS FOR SUCH ADVERSARY PROCEEDINGS, (II) PURSUANT TO FED. R. CIV. P. 12(b) AND FED. R. BANKR. P. 7012(b), DISMISSING THE ADVERSARY PROCEEDING WITH PREJUDICE, OR (III) IN THE ALTERNATIVE, DISMISSING THE ADVERSARY PROCEEDING ON THE GROUND OF JUDICIAL ESTOPPEL (DOCKET NO. 19401)**
- 2. MOTION BY MICROCHIP TECHNOLOGY INCORPORATED SEEKING AN ORDER (I) PURSUANT TO FED. R. CIV. P. 60 AND FED. R. BANKR. P. 9024, VACATING PRIOR ORDERS ESTABLISHING PROCEDURES FOR CERTAIN ADVERSARY PROCEEDINGS, INCLUDING THOSE COMMENCED BY THE DEBTORS UNDER 11 U.S.C. §§ 541, 544, 545, 547, 548, OR 549, AND EXTENDING THE TIME TO SERVE PROCESS FOR SUCH ADVERSARY PROCEEDINGS, (II) PURSUANT TO FED. R. CIV. P. 12(b) AND FED. R. BANKR. P. 7012(b), DISMISSING THE ADVERSARY PROCEEDING WITH PREJUDICE, OR (III) IN THE ALTERNATIVE, DISMISSING THE ADVERSARY PROCEEDING ON THE GROUND OF JUDICIAL ESTOPPEL +(DOCKET NO. 19677)**

The facts set out in the Motions are substantially similar to the relevant facts with respect to Ahaus so that any relief granted for the benefit of the Moving Preference Defendants should be granted to Ahaus. Ahaus served and filed a similar motion in its adversary proceeding (07-02076). It was substantially copied from Wagner-Smith Company’s motion. It sets forth additional facts and arguments which provide additional reasons why the relief sought in the Motions should be granted to Ahaus.

Dated: New York, New York  
May 10, 2010

**HARRIS D. LEINWAND, ESQ.**

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/S/  
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